

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MISSOURI

In re
CAROL LINDA DILLE

Debtor

Case No. 18-42994

Chapter 13

OPPOSITION TO TRUSTEE
MOTION AND ORDER SANCTIONING CREDITOR
FOR VIOLATING AUTOMATIC STAY

COME NOW, Karen Nations hereby appears and files this opposition to Trustee's Motion and Order Sanctioning Creditor for Violating Automatic Stay and says:

1. I received the Notice of No Discharge filed on February 16, 2021 (doc 290). I misunderstood what that notice meant and thought I could begin collecting again on the judgment entered against Ms. Dille.

2. Accordingly, I filed the transcript on April 10, 2021. My clients had nothing to do with my actions in this matter.

3. When the trustee filed his motion to sell real estate free and clear of liens, I knew my lien filing was moot.

4. The court issued its orders on May 11, 2021 that the real estate could be sold free and clear of liens, I again knew the lien would be moot.

5. As for the Trustee calling my office on May 20, I was out of town and my virtual answering service was supposed to tell callers I was out of the office from May 14 to May 21. I have

already let that service know of their error in telling the trustee I was with a client.¹ But as a virtual service, it is not like the message taker could walk into my office and make me aware of the urgent message. I did acknowledge receipt of the trustee's email with a copy of the motion and told him I would take it up upon my return on May 24. The trustee never included any information in the email except the copy of the motion so that I may know this really couldn't wait until Monday.

6. Earlier today, I filed a request with Jackson County Circuit Court a request to release the lien. A copy of the request and acknowledgement it was received by the efilng system is attached hereto as Exhibit A.

7. The Court had already ordered that the Trustee could sell the real estate free and clear of liens so the lien should not be an impediment to selling any real estate and no damage has occurred to the estate.

WHEREFORE, based on the foregoing, I request the trustee's motion be denied.

s/ Karen Nations

Karen Nations, KS-486

P.O. Box 13.63

Overland Park, KS 66282

karen@nationslaw.us

(913)825-1455 Fax: (913)825-1450

CERTIFICATE OF SERVICE

I HEREBY CERTIFY Service of the foregoing was affected via electronic transmission to all listed parties through the Court's ECF filing system this 24th day of May 2021.

s/ Karen Nations

Karen Nations, KS-486

¹ To make matters worse, my router was unplugged during the week so the "out of office" reply that should have been sent to the trustee advising I was not available did not go out.

**IN THE ASSOCIATE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY**

RICH MEYERS)	Case No. 1416-CV10794
AND MARVIS MEYERS)	
Plaintiffs,)	Division: 29
vs.)	
)	
CAROL L DILLE)	
)	
Defendant.)	

RELEASE OF JUDGMENT LIEN

COME NOW now plaintiff by and through counsel and releases any lien in effect pursuant to the judgment entered in this case. The judgment will otherwise remain in full force and effect.

/s/ Karen Nations
Karen Nations, MoBar #56295
P.O. Box 13063
Overland Park, KS 66282
Phone: 913-825-1455, Fax: 913-825.1450
Karen@nationslaw.us
Attorney for Plaintiff

Karen Nations

From: Missouri Courts eFiling System <mocourts.efiling@courts.mo.gov>
Sent: Monday, May 24, 2021 12:20 PM
To: Missouri Courts eFiling Subscriber
Cc: karen@nationslaw.us; 16th Judicial Circuit (Jackson County)
Subject: Receipt of Submission - 1416-CV10794 - RICH MEYERS ET AL V CAROL L DILLE, Jackson County - Kansas City - Civil

Your submission on **5/24/21 at 12:18 PM** was **RECEIVED** by **Jackson County - Kansas City - Civil** on **5/24/21 at 12:18 PM** but has not been processed.

You will receive notice from the court when the submission is accepted for filing, put on hold, or returned with the reason for the hold or return. You do not need to take action at this time.

Below is important information regarding this filing:

eFiling Confirmation Number	EF23500434
Filer Reference Number	None entered by filer
Payment Confirmation Number	No filing fee or payment information on this filing.
Case Number	<u>1416-CV10794</u>
Case Description	RICH MEYERS ET AL V CAROL L DILLE
Case Type	Promissory Note

Notes to Clerk: None Entered by Filer

Document(s):

Document Category and Type	Filing - Other/Miscellaneous - Release (other)
Document Title	<u>lien release</u>
Attachment(s)	<u>Electronic Filing Certificate of Service</u>
File On Behalf Of	MARVIS MEYERS ; RICH MEYERS

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Service Information:

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Service E-mail Address	wainsworth@andersonlawgroupllc.com

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